

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

DONALD and MARY THORNTON,

PLAINTIFFS,

VS.

**ROLLIN VAUGHN SOWARDS; and
PROGRESSIVE INSURANCE CO.,**

DEFENDANTS.

CASE NO.: 2:06-CV-1072-MHT

MOTION TO COMPEL

TO: Debra P. Hackett, Clerk
United States District Clerk's Office
Middle District of Alabama
Post Office Box 711
Montgomery, Alabama 36101-0711

1. In June 2007, all parties had a face-to-face meeting concerning the case and resolution of these matters. The parties have discussed settlement; however, the undersigned has requested that discovery be answered.

2. The undersigned has written counsel for the Defendant on two occasions since the face-to-face meeting requesting answers to discovery and possible dates of deposition. Neither have been produced.

WHEREFORE, based on the foregoing, Movant request an Order from the Court compelling the defense counsel to answer all discovery within 15 (fifteen) days and to also file available dates for deposition.

s/ William B. Alverson, Jr.
William B. Alverson, Jr.
Bar Number ASB-1162-A60W
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CERTIFICATE OF SERVICE

I hereby certify that on August _____, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following attorneys:

Mr. Alex L. Holtsford, Jr.
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s/ William B. Alverson, Jr.
William B. Alverson, Jr.